

# Exhibit "G"

LAW OFFICES

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Joel S. Isenberg

January 6, 2006

Christopher E. Sanspree  
BEASLEY, ALLEN, CROW, METHVIN  
PORTIS & MILES, P.C.  
Post Office Box 4160  
Montgomery, Alabama 36103

RE: Donald Bell; Katrina Bell v. Travelers Property Casualty Insurance Company, et al.  
Our File Number: 18043

Dear Chris:

We are in receipt of the plaintiffs' unsigned responses to Standard Fire's First Interrogatories. As you know, the Federal Rules require that the interrogatories be signed by the parties. Please provide signed interrogatory responses within ten calendar days.

Moreover, the plaintiffs' responses to Interrogatories 13 and 14 are non-responsive. In response to Interrogatory 13, the plaintiffs simply refer to their Complaint. However, the Complaint does not include the policy provisions upon which the plaintiffs base their claim, and a simple reference to the Complaint is non-responsive. Interrogatory 14 requests that the plaintiffs describe in detail the communications they have had with anyone regarding the calculation of damages. In response to Interrogatory 13, the plaintiffs state that "[t]he cost continue to grow each day." This answer is non-responsive to the specific question posed to the plaintiffs.

Finally, the plaintiffs unilaterally refused to respond to Interrogatories 15 through 25, claiming that the exceed the number set forth within the Court's Scheduling Order. First, I do not see that the Scheduling Order contains a specific number of permissible interrogatories and we proposed a maximum of 40 interrogatories in our Report of Parties Planning Meeting. Second, the Federal Rules of Civil Procedure permit, at a minimum, twenty-five interrogatories, which is the number propounded by Standard Fire. Third, any objections that the plaintiffs may have had on this or any other ground have been waived by them. Standard Fire served its Interrogatories and Requests for Production on the plaintiffs on October 4, 2005. Accordingly, any objections and responses were due no later than November 7, 2005. However, it took several letters from this office after November 7 to obtain even unsigned responses from your office, and we did not receive

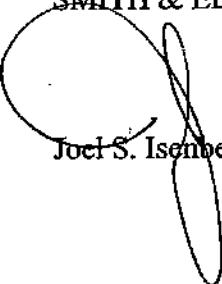
Mr. Christopher Sanspree  
January 6, 2006  
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these until after our December 20 letter to you. The plaintiffs failed to raise any objections within the time prescribed by the Federal Rules of Civil Procedure, and they are therefore waived.

Please reconsider your responses to Interrogatories 13 and 14, and please respond fully to Interrogatories 15 through 25, within ten calendar days. If the plaintiffs fail to do so, we will have no choice but to file a motion to compel with the Court.

Sincerely,

SMITH & ELY, LLP

  
Joel S. Isenberg

JSI/lj

cc: Brenen G. Ely